

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

LATOYA BROWN, *et al.*, individually and on
behalf of a class of all others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI, *et al.*,

Defendants.

Civil Action No.
3:17-cv-00347-WHB-LRA

**JOINT MOTION FOR
EXTENSION OF BRIEFING
SCHEDULE FOR DEFENDANTS'
MOTION TO DENY
CLASS CERTIFICATION**

Plaintiffs and Defendants (collectively, the “Parties”) respectfully submit this Joint Motion for extension of deadlines in connection with Defendants’ Motion to Deny Class Certification (ECF Nos. 238-29). In support of this Joint Motion, the Parties would show as follows:

1. On February 27, 2018, Magistrate Judge Anderson entered a Stipulated Scheduling Order concerning the schedule for briefing and expert discovery on Plaintiffs’ motion for class certification (ECF No. 202). Pursuant to this Order, Plaintiffs’ motion for class certification was filed on March 14, 2018 (ECF Nos. 231-32). Defendants’ opposition to the motion for class certification is due on May 8, 2018, and Plaintiffs’ reply in further support of the motion is due on July 2, 2018.

2. The Parties have conferred and agree, subject to the Court’s approval, that the schedule for briefing Defendants’ Motion to Deny Class Certification, which was also filed on March 14, 2018, should be modified to correspond to the existing schedule for briefing on Plaintiffs’ motion for class certification.

3. Under the briefing schedule proposed by the Parties, Plaintiffs' briefing in opposition to Defendants' Motion to Deny Class Certification would be due on or before May 8, 2018, and Defendants' reply briefing would be due on or before July 2, 2018.

4. The Parties now jointly submit that good cause exists for entry of an Order reflecting the foregoing agreement of the Parties. The Parties are contemporaneously submitting an agreed proposed Order to the Court via e-mail, and respectfully request that the Court approve and adopt the proposed Order as an Order of the Court.

5. The Parties reserve all rights, claims, and defenses, both procedural and substantive, with respect to all pending motions and other matters, and this Joint Motion does not constitute a waiver or concession with respect to any such right, claim, or defense.

Dated: April 5, 2018

By: /s/ Joshua Tom
Joshua Tom

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CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2018, I caused the foregoing **JOINT MOTION FOR EXTENSION OF BRIEFING SCHEDULE FOR DEFENDANTS' MOTION TO DENY CLASS CERTIFICATION** to be electronically filed with the Clerk of the Court using the CM/ECF system, which has generated and delivered electronic notice of filing to all counsel of record who have consented to electronic service.

/s/ Joshua Tom